ASH GROVE CEMENT COMPANY

"WESTERN REGION"

Date: March 7, 1994

To: Mr. Fred Austin
Puget Sound Air Pollution Control Agency

From: Gerald J. Brown   Subject: **MEETING
                                   CONFIRMATION**

Copy: Ken Rone
      Hans Steuch

This letter is to confirm our meeting with PSAPCA set for March 17, 1994 at 10:00 am.

Please inform me if any conflicts should arise.

ASH GROVE CEMENT COMPANY

"WESTERN REGION"

Date: March 8, 1994

To: Ken Rone
    Hans Steuch

From: Gerald J. Brown   Subject:Condition Report
                                       03/08/94

Copy: Ed Pierce
      Trygve Hille
      Matt Cohen

I called PSAPCA at 8:15 am to report an opacity excursion related
to an undetermined cause believed to be associated with the main
baghouse. I was told by the PSAPCA operator that PSAPCA is no
longer taking calls of that nature but to write a letter about
the condition and submit it with our month end CEM report.

                                              Cohen

When previously informed of a letter by Jim Nolan, PSAPCA
regarding this condition report policy, Mr. Cohn advised that in
order to claim the upset defense, excess emissions believed to be
unavoidable needed to be reported by telephone as soon as it is
realized that the emission resulted from a malfunction or other
unavoidable upset conditions.

Until this matter is settled, I believe we should continue
telephone reporting and document our efforts and the agency's
response.

AGREE .

ASH GROVE CEMENT COMPANY

"WESTERN REGION"

Date: March 18, 1994

To: Ken Rone

From: Gerald J. Brown   Subject: PSAPCA MEETING
                                        March 17, 1994

Copy: Hans Steuch
      Trygve Hille
      Ed Pierce
      Matt Cohen

The meeting requested in our 01/21/94 response to Notice of Violation No. 32263 was held on March 17, 1994 to discuss compliance issues with PSAPCA. Those in attendance were Jay Willenberg and Fred Austin, PSAPCA. Ash Grove Cement Company was represented by Ken Rone, Trygve Hille, Hans Steuch, Jerry Brown, and Matt Cohen, Heller, Ehrman, White and McAuliffe. The following was discussed:

1.   Defining kiln start up for exemption permit limits.
It was requested that the PSAPCA permit is modified to exempt permitted limits during kiln start-up as stated in the PSD Application. PSAPCA was amenable to modifying the permit which sets new limits for startup as long as there is no increase in the annual emission rate. Ash Grove is to propose a permit amendment for emissions which justifies new limits and defines the startup period. In evaluating the startup scenario, all limits should be considered.

2.   PPM and LBS/HOUR exceedances occurring simultaneously should not be separate violations.
PSAPCA is willing to consider a new concentration level which will not cause an increase in the lbs/hour max limit. Ash Grove is to propose the wording which defines the single violation. This proposal may be applied to all permitted emission limits.

3.   PSAPCA clarification of a CEM violation.
PSAPCA will clarify to the community at a later date. Ash Grove will not report CEM Violations until instructed by PSAPCA to do so. The CEM-1 and CEM-2 reports will be changed to show periods of invalid CEM operation instead of CEM VIOLATIONS. Previously submitted CEM reports including November 1993 will be revised and submitted showing this change.

4.   PSAPCA procedure for reporting upset conditions to qualify for the upset defense.
PSAPCA will clarify in writing to the community. The Agency does not want telephone reports but will accept a fax or a written condition report for claiming upsets as soon as the cause has been determined.

5.   Penalties
A new Notice of Violation will be issued based on the revised CEM reports for November and December 1993, January and February 1994. Any penalties resulting for these months, will be combined in a single proposed penalty. Work sheet showing penalty calculations will be provided by PSAPCA.
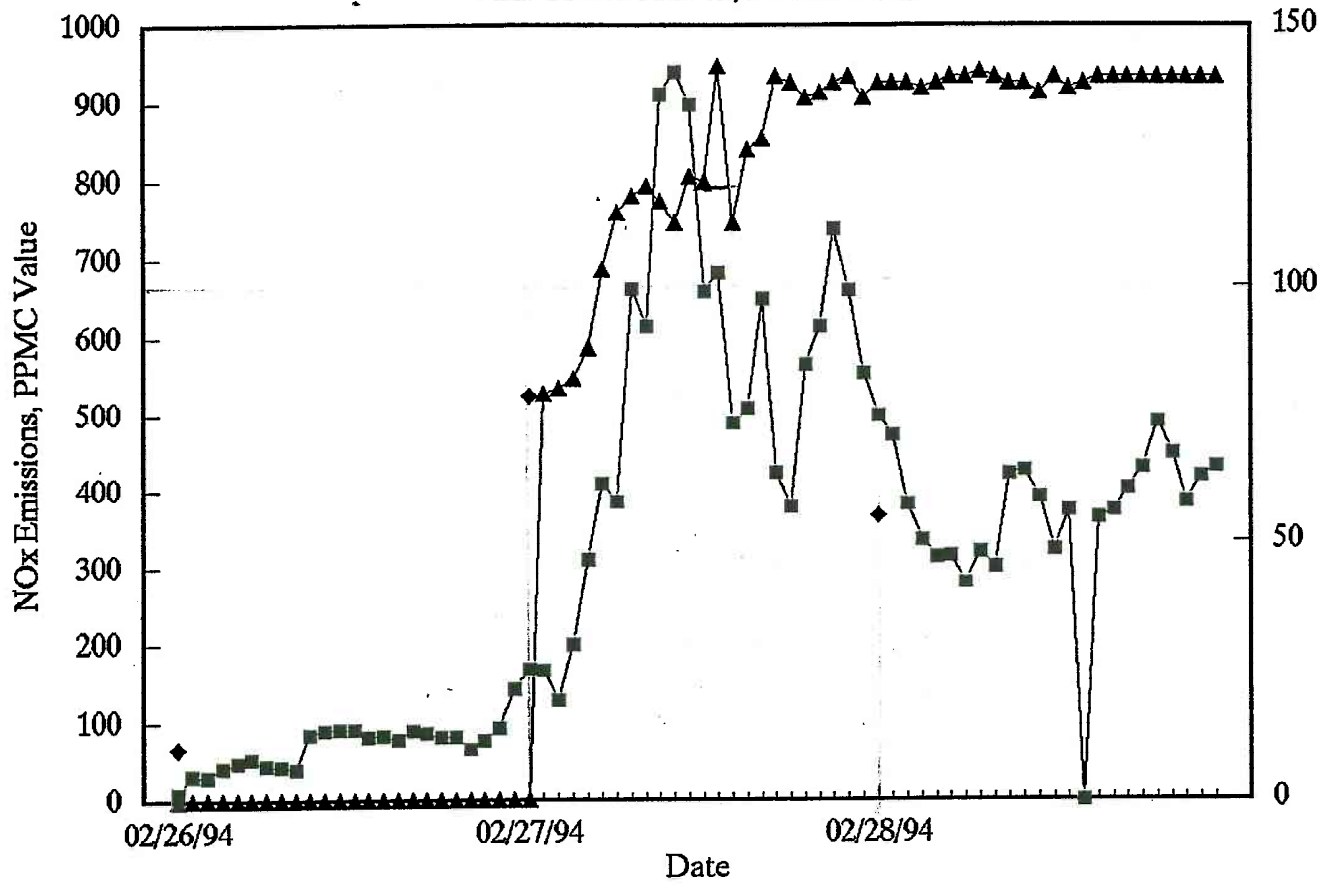
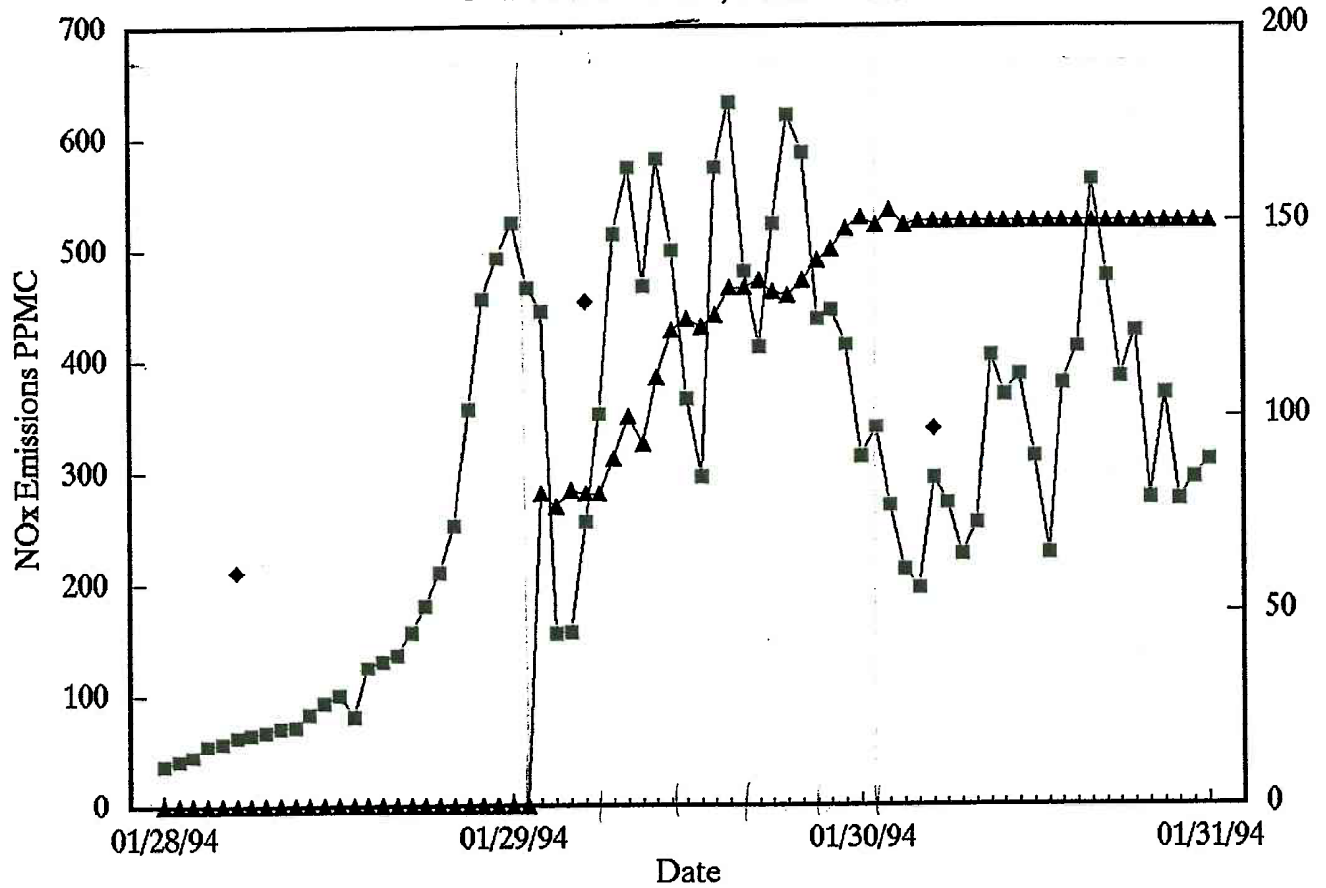# NOx Emissions During Startup
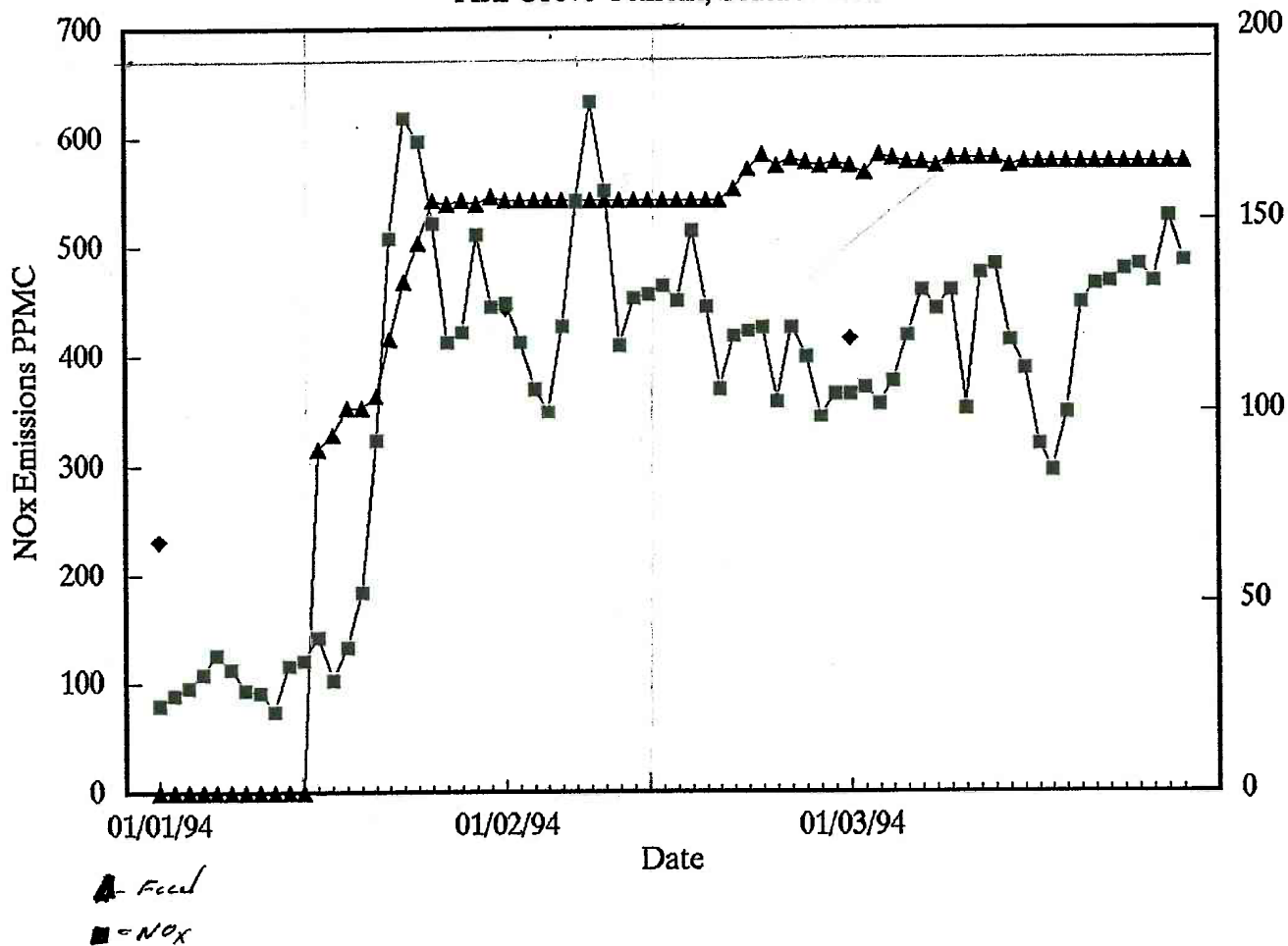
Ash Grove Cement, Seattle Plant

Legend:
▲ = Feed
■ = NOx

NOx Emissions During Startup
Ash Grove Cement, Seattle Plant

NOx Emissions During Startup

Ash Grove Cement, Seattle Plant

Date: March 17, 1994
Subject: PSAPCA MEETING
        March 17, 1994, 10:00 am

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1.   Status of current operations.
                When and why problems are occuring.
                New SO2 monitor.
2. c   PSAPCA clairfication of a CEM violation.
3. A   Start up NOx & SOx limits.
4. B   PPM and LBS/HOUR exceedances separate violations.
5. D   PSAPCA procedure for reporting upset conditions.
6. E   Proposed penalties resulting from NOV.

<center>ATTENDANCE</center>

Fred Austin
Jay Willinsburg
Matt
Hans
Trysve
Mu

Startup first 24 hr low chance of exceedance 24-48 probable change
of NOx
        - PSAPCA order amended to reflect modify Notice of Const
Ton/year limits workable #6C explicit on start up period
will to work with us. — Month long process No Emission
increase will not require public comment. Stay below annual
Tonnage/yr ~ hr + suggest over appl re Plmt
        - Amenable to setting new permit limits for startup
                tie - 2x NOx current limit
                - Propose a permit Amendment.
                - Define scenario to include all at once.

B. Can we get one limit set equivalent to a 40 lb/hr
    rate ~ willing to consider concentration level that will
    enforce   wanting to have single violation
    as long as 40 pph to apply to all.

C. A CEM violation — unless instructed by Psapca
    No CEM violation will be reported — report exceedance hours

D. upset defense — Requested letter defi asap means
    dont want phone calls. Fax + Mail new determine cancel.
    To claim upset claim in writing w/ permit letter
    ask a what

E. Penalty Nov + subsequent month to be combined into one.
    will Regino a new Nov.

Larry Vaughn
5 Book File NOL

PUGET SOUND AIR POLLUTION CONTROL AGENCY
110 Union Street, Suite 500
Seattle, WA 98101

(206) 343-8800   (800) 552-3565   FAX: (206) 343-7522

COMPANY NAME: Ash Grove

ATTENTION: Gerry Brown

ADDRESS:

FAX: 623-5355

SUBJECT:

COMMENTS: Questions for May 9th letter Read these & lets talk some more. We also need to talk about "Penalty Worksheet" values.

SENT BY: Fred Austin

TODAY'S DATE: May 17 1994

Number of pages including this cover sheet: 2

Form No. 61-169   2/94

AGCS2M000009

- Questions concerning May 9th letter

- Are the stack pollutants SO_2, CO, NO_x & O_2
  measured wet or dry by CEM system.

- Compare PSD & PSAPCA limits.
  Are they wet or dry standards?

- How much error is inherent in using
  a constant stack moisture for extended periods?
  May need to install H_2O CEM for
  moisture (O_2 wet/dry; NDIR; etc) to statisfy
  Approval conditions for modifying NC 3382

- For CEM system rata's the Agency has much
  more confidence with the use of source
  test analyzer methods than a series of
  grab samples. Will Ash Grove use
  analyzer methods for future CEM system
  RATA's?

(r+1) - Modif equations in Attachment 10 as needed for
  wet/dry conversions as needed.

- Use CEM to measure (ppm); (O_2); (H_2O); Q
  to calculate lb/hr emission rates and compare
  with standards ($SO_2 = 40$ lb/hr); ($CO = 538$ lb/hr); ($NO_x = 590$ lb/hr);
  ($NO_x = 422$ lb/24hr)
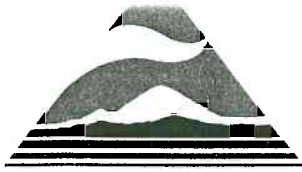
PUGET   SOUND   AIR   POLLUTION   CONTROL   AGENCY

KING COUNTY   ▲   KITSAP COUNTY   ▲   PIERCE COUNTY   ▲   SNOHOMISH COUNTY

June 1, 1994

Gerald J. Brown
Manager, Safety and Environment
Ash Grove Cement Company
3801 East Marginal Way South
Seattle, WA 98134

Dear Mr. Brown:

Ash Grove Cement Company

A review of our May 18, 1994 letter requesting revisions to Notice of Construction No. 3382 has prompted the following questions and comments. Some of these questions were sent via FAX to you on May 17, 1994.

(A)   Check the methods used by Ash Grove to measure the stack emissions to find if these methods provide wet or dry measurements.

(B)   Compare the requirements of PSAPCA and the PSD permit and make sure the reported emissions of the PSAPCA limits are on a dry standard basis.

(C)   Check that the SO_2 Relative Accuracy Test Audit (RATA) calculations have been corrected to dry standard conditions.

(D)   A question raised in a previous letter concerns the error inherent in using a constant stack moisture for extended periods of time for emission corrections to dry conditions. Please quantify the error associated with the use of an assumed H_2O percent for reporting the emission calculations and compare with the use of a wet/dry continuous monitoring device.

(E)   Modify the equations in "Attachment 10" as needed to reflect dry conditions.

(F)   The Agency has reviewed the SO_2 RATA performed using Method 6 and finds it acceptable. For future tests, will Ash Grove use analyzer methods (i.e. Method 6C or 7E) for performing the annual re-certification tests?

(G)   Notice of Violation (NOV) No. 31785 issued May 6, 1994 was for fugitive emissions from the kiln seal during startup when the kiln was rotating. Fugitive dust was also seen from the plant during the weekend of May 22, 1994. There is a scheduled inspection on June 9, 1994 to observe the operation of the kiln seals during startup. These fugitive dust problems have

AGCS2M000011

generally not been observed during previous startup cycles. The Agency is concerned about this apparent fundamental change in emissions.

(i) The Ash Grove letter of May 18, 1994 indicates these fugitive dust emissions "could not be avoided." However, Ash Grove attached a letter from Fuller (June 29, 1992) which states, "When an upset condition occurs in the process which requires that kiln and I. D. fan be stopped, it is possible that some dust may be released through openings at the discharge hood." The reference is when the kiln and I. D. fan are stopped, but NOV No. 31785 occurred when the kiln was turning.
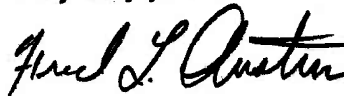
(ii) Also, the Fuller letter indicates additional venting at the G-cooler could be installed to control dust "irrespective of whether the kiln is running or not." Has this additional venting been installed?

The revisions to the Ash Grove permit will not be retroactively applied. Notices of violation are being issued for the emissions exceeding the limits as measured by the CEM system during the first quarter of 1994.

Please provide the requested information in order to allow the processing of your permit revision request.

Please contact me at 689-4055 or FAX 343-7522 if you have any questions.

Very truly yours,

Fred L. Austin
Air Pollution Engineer

mj

cc D. S. Kircher
  J. M. Willenberg
  R. G. Busterna
  T. J. Hudson

ASH GROVE CEMENT COMPANY

"WESTERN REGION"

3801 EAST MARGINAL WAY, SOUTH
SEATTLE, WA 98134
PLANT OFFICE: (206) 623-5596
FAX: (206) 623-5355

TELECOPIER TRANSMISSION REPORT

DATE: 6/16/99

TO: Hans Steuch

COMPANY:

FROM: CJ Brown

SUBJECT:

NUMBER OF PAGES (including cover): 21

Fred Says:

SUBJECT: ~~Fax~~

COMMENTS: I'm preparing a NOV for 12/93 & 1/94 - 2/94. These numbers are preliminary for the Civil Penalty. Please Review & add any info.

SENT BY: Fred Austin

TODAY'S DATE: 4-26-94

Number of pages including this cover sheet: 21

Source: ASHGROVE
Case No: _____ NOV No: **32263**

The following procedure shall be employed in making a recommendation for assessment of civil penalties for violations of Agency regulations or permits determined through continuous emission monitoring or source testing. Guidance for answering the questions in Table I are found on the back of this sheet. Civil penalties involving demonstrable economic benefit to the violator shall include both a gravity and a benefit component and shall be determined by adding the dollar amount from Table II below and the economic benefit calculated using the EPA BEN computer model. Civil penalties for other violations shall consist of a gravity component only and shall be determined from Table II.

Table I
Gravity Criteria

	No (0)	Possibly (1)	Probably (2)	Definitely (3)
1. Did the violation result in air pollution?				✓
②Was it a willful or knowing violation?				
3. Was the violator unresponsive in correcting the violation?	✓			
4. Was the violation a result of improper operation or inadequate maintenance?		✓		
5. Did the violator have a history of similar violations?	✓			
6. Did the violator benefit economically from noncompliance?	✓			

Total Gravity Criteria Rating   4 + ②

Table II
Gravity Component Penalty

Rating:	1-4	5-7	8-9	10	11	12	13	14	15	16+
Penalty:	$1,000	$2,000	$3,000	$4,000	$5,000	$6,000	$7,000	$8,000	$9,000	$10,000

Benefit Component Penalty

If the answer to question #6 in Table I is "Definitely", the estimated dollar amount of economic benefit determined by the EPA BEN computer model is: $_____ (attach calculations).

Comments: _See Attach worksheets which are copies of the Ashgrove CEM daily violation reports._

SO₂ ≤33 ppm/hr # 16,000   ≤ 40 lb/hr # 26,000
NOx ≤ 668 ppm/hr # 2,000   ≤ 590 lb/hr #   0
CO   ≤ 1000 ppm/hr # 2,000   ≤ 538 lb/hr #   0
                  # 20,000   26,000

Evaluator: _____ Date: _____ Civil Penalty Recommendation: $ 26,000

Checked By: _____ Date: _____

1. *Did the violation result in air pollution?*

Answer "no" if the violation was not the result of an emission. Use the following table if an emission standard was violated:

Percent Above Emission Standard	Rating
1-24%	0
25-99%	1
100-199%	2
>200%	3

2. *Was it a willful or knowing violation?*

Answer "no" if the violator obviously did not know that the action or inaction constituted a violation. Answer "possibly" if it is likely the violator knew. Answer "probably" if the violator should have known. Answer "definitely" if the violator clearly knew.

3. *Was the violator unresponsive in correcting the violation?*

Answer "no" if the violation was corrected as soon as the violator learned of it. Answer "possibly" if the violation was corrected in a less timely and cooperative fashion. Answer "probably" if the violator attempted to correct the problem, but did not correct it. Answer "definitely" if the violator did not attempt to correct the problem.

4. *Was the violation a result of improper operation or inadequate maintenance?*

Answer "no" if the violator was following an acceptable O & M plan. Answer "possibly" if the violator was following an O & M plan that was not adequate. Answer "probably" if the violator did not have an O & M plan. Answer "definitely" if the violator did not have an O & M plan and the violation was clearly a result of improper O & M.

5. *Did the violator have a history of similar violations?*

Answer "no" if the violation did not occur previously. Answer "possibly" if the violation may have occurred before, but has not been previously cited. Answer "probably" if the violation occurred previously, but had not been previously cited. Answer "definitely" if the violation had been previously cited.

6. *Did the violator benefit economically from noncompliance?*

Answer "no" if the violator clearly did not obtain any economic benefit. Answer "possibly" if the violator may have benefited. Answer "probably" if the violator benefited, but the benefit is not quantifiable. Answer "definitely" if the economic benefit to the violator is quantifiable.

Form No. 80-226 (4/30/92)

RECEIVED

Form CEM-1

PUGET SOUND AIR POLLUTION CONTROL AGENCY
ENGINEERING DIVISION
110 UNION STREET, SUITE 500, SEATTLE, WA 98101
(206) 689-4405

Month of November 1993

CEM - MONTHLY SUMMARY REPORT

Date Recieved:

Name:	Ash Grove Cement Co.		
Address:	3801 E Marginal Way S	City:	Seattle, WA 98134
Contact:	Jon Trygve Hille	Tele #:	(206) 623-5596

Basic Equipment:	Cement Kiln
Control Equipment:	Dry Scrubber Baghouse
CEM Equipment:	Continuous Emission Monitors

Complete a Form CEM-2 for each parameter checked below:

		Make & Model	Allowed Limit	CEM Violations	Emission Violations
x	Opacity	Lear Siegler	20% @ 1 hr	0	0
		Dynatron 1100M	5% @ 3 min		0
x	SO2	Lear Siegler	33 ppm @ 1 hr	3	79
		8960	40 lb/hr @ 1 hr		150
x	NOx	Lear Siegler	668 ppm @ 1 hr	3	30
		8940	590 lb/hr @ 1 hr		7
			478 ppm @ 1 day	3	1
			422 lb/hr @ 1 day		1
x	CO	Beckman Ind.	1000 ppm @ 8 hrs	3	1
		880	538 lb/hr @ 8 hrs		1
x	O2	Servomix 1420	n/a	3	n/a
x	Flow	EMRC	n/a	0	n/a

229

15   270   Total = 285.

Attach a supplemental report for each emission violation and for each violation of monitoring requirements (e.g. less than 90% valid hours of daily monitoring). Violations are subject to PSAPCA enforcement actions, including civil penalties of up to $10,000 per day

QUARTERLY (OR RATA) CERTIFICATION TESTING:

	Last Completed	Passed	Failed	Next Scheduled
RATA Certification	11/13/93	O2,NOx,CO,Flow	SO2	
Qtrly Certification	None			

I hereby certify the attached information is true and accurate to the best of my knowledge.

_____
Signature

12/29/93
Date

AGCS2M000016

FORM CEM-2
Monthly Summary of Monitoring

Month: **November 1993**
Quarter: **4th**

(handwritten across table): kmit   33 ppm   40 lb/hr
Gravity Criteria #2

Day	Hours Oper.	Hours Monit.	Hours Exceed 1 hour ppmo lim.	Max Hourly ppmo Reading	Hours Exceed 1 hour lb/hr lim.	Max Hourly lb/hr Reading	Hours Malfunction CEM	Hours Malfunction Equip.	Hours Viol.	Days Viol.	Daily Calib.	Qtrly Test	Gravity Component Penalty
11/01													
11/02													
11/03													
11/04													
11/05													
11/06													
11/07													
11/08													
11/09													
11/10													
11/11													
11/12	24.0	24.0	13.0	78.8	13.0	89.0	0.0	0.0	13.0	0.0	Yes	No	$2000
11/13	24.0	24.0	18.0	70.3	16.0	72.0	0.0	0.0	18.0	0.0	Yes	No	2000
11/14	5.0	5.0	1.0	66.3	0.0	37.0	0.0	0.0	1.0	0.0	Yes	No	2000
11/15	0.0	0.0	0.0	0.0	0.0	2.0	0.0	0.0	0.0	0.0	Yes	No	
11/16	11.0	11.0	3.0	91.0	2.0	97.0	0.0	0.0	3.0	0.0	Yes	No	2000
11/17	24.0	23.0	5.0	85.0	5.0	53.0	1.0	0.0	7.0	0.0	Yes	No	2000
11/18	24.0	22.0	22.0	67.8	17.0	64.0	2.0	0.0	24.0	0.0	Yes	No	2000
11/19	24.0	24.0	5.0	38.3	24.0	83.0	0.0	0.0	24.0	0.0	Yes	No	2000
11/20	24.0	24.0	1.0	34.0	8.0	81.0	0.0	0.0	8.0	0.0	Yes	No	200
11/21	14.0	14.0	0.0	14.0	0.0	2.0	0.0	0.0	0.0	0.0	Yes	No	
11/22	8.0	8.0	2.0	118.3	2.0	62.0	0.0	0.0	2.0	0.0	Yes	No	200
11/23	15.0	15.0	0.0	28.3	3.0	61.0	0.0	0.0	3.0	0.0	Yes	No	2000
11/24	0.0	0.0	0.0	0.0	0.0	2.0	0.0	0.0	0.0	0.0	Yes	No	
11/25	0.0	0.0	0.0	0.0	0.0	2.0	0.0	0.0	0.0	0.0	Yes	No	
11/26	16.0	16.0	6.0	98.0	7.0	79.0	0.0	0.0	8.0	0.0	Yes	No	2000
11/27	24.0	24.0	2.0	35.0	21.0	74.0	0.0	0.0	21.0	0.0	Yes	No	200
11/28	24.0	24.0	0.0	31.3	24.0	69.0	0.0	0.0	24.0	0.0	Yes	No	200
11/29	24.0	24.0	1.0	33.8	8.0	80.0	0.0	0.0	8.0	0.0	Yes	No	200
11/30	24.0	20.0									Yes	No	200
Total	261.0	259.0	79.0	118.3	150.0	97.0	3.0	0.0	164.0	0.0			# 16,000
QTD	281.0	259.0	79.0	118.3	150.0	97.0	3.0	0.0	164.0	0.0			# 26,0

FORM CEM-2
Monthly Summary of Monitoring

Parameter Monitored: **NOx** Month: **November 1993** Quarter: **4th**

Day	Hours Oper.	Hours Monit.	Hours Exceed 1 hour ppmo lim.	Hours Exceed 1 day ppmo lim.	Max Hourly ppmo Reading	Hours Exceed 1 hour lb/hr lim.	Hours Exceed 1 day lb/hr lim.	Max Hourly lb/hr Reading	Hours Malfunction CEM	Hours Malfunction Equip.	Hours Viol.	Days Viol.	Daily Calib.	Qtrly Test
11/01														
11/02														
11/03														
11/04														
11/05														
11/06														
11/07														
11/08														
11/09														
11/10														
11/11														
11/12	24.0	24.0	0.0	0.0	596.8	0.0	0.0	486.0	0.0	0.0	0.0	0.0	Yes	No
11/13	24.0	24.0	0.0	0.0	567.8	0.0	0.0	452.0	0.0	0.0	0.0	0.0	Yes	No
11/14	5.0	5.0	0.0	0.0	273.3	0.0	0.0	123.0	0.0	0.0	0.0	0.0	Yes	No
11/15	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.0	0.0	0.0	0.0	0.0	Yes	No
11/16	11.0	11.0	2.0	0.0	859.8	1.0	0.0	817.0	0.0	0.0	2.0	0.0	Yes	No
11/17	24.0	23.0	1.0	0.0	680.0	0.0	0.0	478.0	1.0	0.0	2.0	0.0	Yes	No
11/18	24.0	22.0	0.0	0.0	586.8	0.0	0.0	396.0	2.0	0.0	2.0	0.0	Yes	No
11/19	24.0	24.0	0.0	0.0	233.3	0.0	0.0	192.0	0.0	0.0	0.0	0.0	Yes	No
11/20	14.0	14.0	0.0	0.0	214.3	0.0	0.0	174.0	0.0	0.0	0.0	0.0	Yes	No
11/21	0.0	0.0	0.0	0.0	74.0	0.0	0.0	6.0	0.0	0.0	0.0	0.0	Yes	No
11/22	8.0	8.0	6.0	0.0	949.0	0.0	0.0	561.0	0.0	0.0	6.0	0.0	Yes	No
11/23	15.0	15.0	2.0	0.0	909.3	1.0	0.0	614.0	0.0	0.0	2.0	0.0	Yes	No
11/24	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	Yes	No
11/25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	13.0	0.0	0.0	0.0	0.0	Yes	No
11/26	16.0	16.0	8.0	0.0	913.3	3.0	0.0	612.0	0.0	0.0	6.0	0.0	Yes	No
11/27	24.0	24.0	13.0	1.0	841.8	2.0	1.0	658.0	0.0	0.0	13.0	1.0	Yes	No
11/28	24.0	24.0	0.0	0.0	488.0	0.0	0.0	367.0	0.0	0.0	0.0	0.0	Yes	No
11/29	24.0	24.0	0.0	0.0	376.5	0.0	0.0	306.0	0.0	0.0	0.0	0.0	Yes	No
Total	281.0	281.0	30.0	1.0	949.0	7.0	1.0	658.0	3.0	0.0	33.0	1.0		
QTD	281.0	281.0	30.0	1.0	949.0	7.0	1.0	658.0	3.0	0.0	33.0	1.0		

(handwritten annotations)

Limit 668 ppm 550 lb/hr

Gravity Criteria #2 + 4 points = 5 points ⇒ $2000

11/58

Parameter Monitored: __CO__

FORM CEM-2
Monthly Summary of Monitoring

Month: November 1993
Quarter: 4th

Day	Hours Oper.	Hours Monit.	Times Exceed 8 Hour ppmo lim.	Max 8 Hour ppmo Reading	Times Exceed 8 Hour lb/hr lim.	Max 8 Hour lb/hr Reading	Hours Malfunction CEM	Hours Malfunction Equip.	# of Viol.	Days In Violation	Daily Calib.	Qtrly Test
11/01												
11/02												
11/03												
11/04			_limit_	_1000 ppm_		_538 lb/hr_						
11/05												
11/06												
11/07												
11/08												
11/09												
11/10												
11/11												
11/12	24.0	24.0	0.0	607.4	0.0	285.0	0.0	0.0	0.0	0.0	Yes	No
11/13	24.0	24.0	1.0	1208.1	1.0	455.0	0.0	0.0	1.0	0.0	Yes	No
11/14	5.0	5.0	0.0	989.2	0.0	425.0	0.0	0.0	0.0	0.0	Yes	No
11/15	0.0	0.0	0.0	15.1	0.0	1.0	0.0	0.0	0.0	0.0	Yes	No
11/16	11.0	11.0	0.0	811.5	0.0	240.0	0.0	0.0	0.0	0.0	Yes	No
11/17	24.0	23.0	0.0	610.3	0.0	274.0	1.0	0.0	1.0	0.0	Yes	No
11/18	24.0	22.0	0.0	705.2	0.0	326.0	2.0	0.0	2.0	0.0	Yes	No
11/19	24.0	24.0	0.0	669.7	0.0	329.0	0.0	0.0	0.0	0.0	Yes	No
11/20	14.0	14.0	0.0	658.5	0.0	319.0	0.0	0.0	0.0	0.0	Yes	No
11/21	0.0	0.0	0.0	29.8	0.0	1.0	0.0	0.0	0.0	0.0	Yes	No
11/22	8.0	8.0	0.0	399.8	0.0	59.0	0.0	0.0	0.0	0.0	Yes	No
11/23	15.0	15.0	0.0	579.1	0.0	225.0	0.0	0.0	0.0	0.0	Yes	No
11/24	0.0	0.0	0.0	208.5	0.0	1.0	0.0	0.0	0.0	0.0	Yes	No
11/25	0.0	0.0	0.0	302.3	0.0	1.0	0.0	0.0	0.0	0.0	Yes	No
11/26	16.0	16.0	0.0	669.8	0.0	247.0	0.0	0.0	0.0	0.0	Yes	No
11/27	24.0	24.0	0.0	537.7	0.0	273.0	0.0	0.0	0.0	0.0	Yes	No
11/28	24.0	24.0	0.0	580.2	0.0	276.0	0.0	0.0	0.0	0.0	Yes	No
11/29	24.0	24.0	0.0	502.6	0.0	253.0	0.0	0.0	0.0	0.0	Yes	No
11/30												
Total	261.0	258.0	1.0	1208.1	1.0	485.0	3.0	0.0	4.0	0.0		
QTD	261.0	258.0	1.0	1208.1	1.0	485.0	3.0	0.0	4.0	0.0		

11/14

Gravity Criteria #2 + 4 points = 6 points => $2000

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				Rating
SO_2	9/27	1799	80%	1
	10/05	2113	111%	2
	10/06	2060	106%	2
	10/20	1592	50%	1
	10/24	1105	11%	0
	10/27	1130	13%	0
	10/29	163.4	63%	1
	11/16	1056	6%	0
	11/18	1294	29%	1
	11/19	1787	79%	1

EMISSION MONITORING CIVIL PENALTY WORKSHEET AND RECOMMENDATION (4/16/92)

Source: _Ash Grove_   Case No: _____ NOV No: _32263_

The following procedure shall be employed in making a recommendation for assessment of civil penalties for violations of Agency regulations or permits determined through continuous emission monitoring or source testing. Guidance for answering the questions in Table I are found on the back of this sheet. Civil penalties involving demonstrable economic benefit to the violator shall include both a gravity and a benefit component and shall be determined by adding the dollar amount from Table II below and the economic benefit calculated using the EPA BEN computer model. Civil penalties for other violations shall consist of a gravity component only and shall be determined from Table II.

Table I
Gravity Criteria

	No (0)	Possibly (1)	Probably (2)	Definitely (3)
1. Did the violation result in a public health risk or property damage?			✓	
2. Was it a willful or knowing violation?			✓	
3. Was the violator unresponsive in correcting the violation?	✓			
4. Was the violation a result of improper operation or inadequate maintenance?		✓		
5. Did the violator have a history of similar violations?				✓
6. Did the violator benefit economically from noncompliance?	✓			

Total Gravity Criteria Rating ... $6 + [\#1]$

Table II
Gravity Component Penalty

Rating:	1-4	5-7	8-9	10	11	12	13	14	15	16+
Penalty:	$1,000	$2,000	$3,000	$4,000	$5,000	$6,000	$7,000	$8,000	$9,000	$10,000

Benefit Component Penalty

If the answer to question #6 in Table I is "Definitely", the estimated dollar amount of economic benefit determined by the EPA BEN computer model is: $_____ (attach calculations).

Comments: _____

_____

_____

_____

_____

_____

_____

_____

Evaluator: _____ Date: _____ Civil Penalty Recommendation: $ _49,000_

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